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DISTRICT COURT

CLARK COUNTY NEVADA

EDGAR MARTINEZ-CARRANZA,

Case No.: 2:20-cv-01930-RFB-VCF

Plaintiff, vs.

**STIPULATION TO EXTEND
DEADLINE TO FILE RESPONSE AND
REPLY TO MOTION TO DISMISS**

(SECOND REQUEST)

PLUMBERS AND PIPEFITTERS UNION
LOCAL NO. 525 TRUST FUNDS;
PLUMBERS AND PIPEFITTERS LOCAL
NO. 525 a union organized in Nevada;
PLUMBERS AND PIPEFITTERS LOCAL
NO. 525 PENSION & RETIREMENT
FUNDS, a retirement fund established in
Nevada; BOARD OF TRUSTEES OF THE
PLUMBERS AND PIPEFITTERS LOCAL 525
PENSION TRUST FUNDS, a pension fund
established in Nevada; PLUMBERS AND
PIPEFITTERS UNION LOCAL #525
BENEFIT FUNDS,; TONI C. INSCOE
ADMINISTRATOR FOR THE TRUSTEES
PLUMBERS AND PIPEFITTERS
NATIONAL PENSION FUND; BENESY
INC.,; DOES I through V, inclusive; and ROE
CORPORATIONS VI through X, inclusive,

Defendants

COMES NOW Plaintiff and the Plumbers and Pipefitters Union Local 525 Pension Plan (the "Pension Plan"), by and through their respective attorney of record file this Stipulation on the following terms:

The Pension Plan filed a Motion to Dismiss on January 29, 2021. (ECF No. 10.) Plaintiff's response is due on February 22, 2020, pursuant to the parties' first stipulation which the Court granted. (ECF No. 12.) The parties have agreed to a second extension to extend the time for Plaintiff to respond to February 26, 2020, which is an additional four (4) days. The Parties also agree that the Pension Plan would have an additional four (4) days to file any reply. Therefore the reply would be due March 15, 2021. This stipulation is not made for the purpose of delay, but rather Plaintiff requested additional time to accommodate his counsel's workload, schedule, and family matter. This is the parties' second request to extend time to file responses regarding the Pension Plan's Motion to Dismiss.

Dated this 22nd day of February, 2021.

Dated this 22nd day of February, 2021.

**BROWNSTEIN HYATT FARBER
SCHRECK, LLP**

LAW OFFICES OF BYRON THOMAS


/s/ Christopher M. Humes Esq.

/s/ Byron E. Thomas Esq.

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IT IS SO ORDERED:


RICHARD E. BOULWARE, II
United States District Court

DATED this 24th day of February, 2021.